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Sent: Monday, November 22, 2010 12:36 PM
To: Groundwater Elevation Support
Cc: Marcus.Trotta@scwa.ca.gov
Subject: Comments from Sebastopol Water Information Group (SWiG)

The following are comments on the California Statewide Groundwater Elevation Monitoring Program (CASGEMP) Guidelines from the Sebastopol Water Information Group (SWiG). SWiG is an alliance of west County well owners and Sebastopol residents, providing Sonoma County citizens with accurate scientific information bearing on water supplies and quality. Due to the lack of groundwater monitoring or groundwater level trends in Sonoma County, and no County office to advocate for or respond to the county's many rural well owners, in 2004 SWiG began collecting well monitoring data from local and Sonoma County agencies, and established a monitoring program to help local well owners track the condition of their wells.

In general we find the State guidelines for well measurement and reporting to be clear, and to provide clear and appropriate standards for the well monitoring procedures. But the emphasis on monitoring groundwater basins may omit or restrict monitoring to areas of discharge, overlooking the need to monitor all recharge zones. Although it is true in general that recharge and discharge take place within a basin (that is, at lower elevations), in Sonoma County's southern Santa Rosa Plain subbasin, and some other parts of the state, surrounding highlands may be important recharge zones.

Our only requested change is to add a clarification that the state's groundwater basins are not all recharged from within the basins where most discharges take place, and that the monitoring of some basins may need to include fringing highlands that are the basin's main recharge sites. This could be done as a modification to the definition of basin or subbasin in the list of definitions.

Definition a) now reads: '(a) "Basin" or "subbasin" means a groundwater basin or subbasin identified and defined in the department's Bulletin No. 118.'

Note that Bulletin 118 does define a highlands area in Sonoma County, the Wilson Grove Highlands, as a groundwater basin. Part of the Wilson Grove Highlands Groundwater "Basin" do provide recharge to the Santa Rosa Plain Groundwater Basin, but most of it does not, due to myriad faults that offset the strata and restrict flow to the lower elevations. As a result, the definition of a basin (above) does not suffice in this case and, we suspect, in many others.

Sincerely yours,

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